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Subject: In the manner of the FCC NPRM WT Docket 10-153, Cielo Networks respectfully submits the following comments to the Commission:

Notice of Proposed Rulemaking: Permitting Greater Sharing between FS Operations in Certain BAS and CARS frequencies

Cielo Networks endorses sharing of spectrum at 7 and 13 GHz for FS operations.

As spectrum has become more congested for Part 101 FS operations sharing of 7 and 13 GHz bands with BAS and CARS operators provides options to meet growing needs for spectrum to deliver broadband backhaul services for next generation networks. Following the current Part 101 coordination procedures sharing of the spectrum of 7 and 13 GHz can be accomplished without interfering with current BAS and CARS operators.

Notice of Proposed Rulemaking: Permitting Adaptive Modulation

Cielo Networks endorses permitting of Adaptive Modulation

Adaptive Modulation is now offered by most microwave suppliers allowing operators to automatically decrease modulation to improve system gain and potentially keep a link operational due to fading conditions. Adaptive Modulation has allowed customers sites to remain operational under fading conditions whereas in the past the sites would be down due to the fading. Most fade conditions are temporary and Adaptive Modulation techniques allow automatic reversion to normal operating conditions compliant with FCC usage requirements.

Notice of Proposed Rulemaking: Permitting “Auxiliary” Fixed Stations

Cielo Networks opposes the permitting of “auxiliary” fixed stations

With many metro markets becoming heavily congested in the Part 101 spectrum, permitting multi-point operations in this spectrum is surely to result in interference for current and future spectrum users. Current Point-to-Point operations under the Part 101 rules provides high bandwidth services that are now more common in today’s market. Adding low bandwidth PMP service via “auxiliary” fixed stations is quite likely to add interference against the high bandwidth services critical to customer networks.

Notice of Inquiry: Modification of Efficiency Standards in Rural Areas

Cielo Networks recommends the Commission to continue proceeding with this NOI to further define requirements of efficiency standards in rural areas.

Lowering efficiency standards allows radio systems to operate with higher system gain which can potentially allow greater path lengths, lower transmit power requirements, or smaller antennas. These gains can result in a lower deployment costs improving the businesses case for supporting deployment of microwave networks in typically underserved rural markets.

Notice of Inquiry: Review of Part 101 Antenna Standards

Cielo Networks recommends the Commission to continue proceeding with this NOI to further review current antenna standards in Part 101.

The Commission is encouraged to examine lowering the following antenna requirements at these frequency bands:

6 GHz:	From 6 foot to 4 foot
18 GHz	From 2 foot to 1 foot
23 GHz	From 1 foot to sub 1 foot

Regards,

Brian Wright
Technical Director
Cielo Networks, Inc.